

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, DAVID BALDACCI, MARY BLY, MICHAEL CONNELLY, SYLVIA DAY, JONATHAN FRANZEN, JOHN GRISHAM, ELIN HILDERBRAND, CHRISTINA BAKER KLINE, MAYA SHANBHAG LANG, VICTOR LAVALLE, GEORGE R.R. MARTIN, JODI PICOULT, DOUGLAS PRESTON, ROXANA ROBINSON, GEORGE SAUNDERS, SCOTT TUROW, and RACHEL VAIL, individually and on behalf of others similarly situated,

Plaintiffs,

v.

OPENAI INC., OPENAI LP, OPENAI LLC, OPENAI GP LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION LLC, OPENAI HOLDINGS LLC, OPENAI STARTUP FUND I LP, OPENAI STARTUP FUND GP I LLC, and OPENAI STARTUP FUND MANAGEMENT LLC,

Defendants.

No. 1:23-cv-08292-SHS

JONATHAN ALTER, KAI BIRD, TAYLOR BRANCH, RICH COHEN, EUGENE LINDEN, DANIEL OKRENT, JULIAN SANCTON, HAMPTON SIDES, STACY SCHIFF, JAMES SHAPIRO, JIA TOLENTINO, and SIMON WINCHESTER, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

OPENAI, INC., OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION, LLC, OPENAI HOLDINGS, LLC, and MICROSOFT CORPORATION,

Defendants.

No. 1:23-cv-10211-SHS

**[PROPOSED] ORDER GRANTING DEFENDANTS' MOTION FOR LEAVE TO FILE  
OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL UNDER SEAL**

Having considered the papers submitted and arguments presented in support of Defendants OpenAI, Inc.'s, OpenAI OpCo, LLC, OpenAI GP, LLC's, OpenAI LLC's, OpenAI Global LLC's, OAI Corporation LLC's, OpenAI Holdings, LLC's, OpenAI Startup Fund GP I, LLC's, OpenAI Startup Fund I, LP's, and OpenAI Startup Fund Management, LLC's (hereinafter "OpenAI") Motion to Seal Defendants' Opposition to Plaintiffs' Motion to Compel, and finding compelling reasons to be shown, the Court hereby orders the following to be filed under seal.

Document to be Sealed	Basis for Sealing Documents or Portions Thereof
Portions of OpenAI's Opposition to Plaintiffs' Motion to Compel	The highlighted portions of the letter brief in opposition to Plaintiffs' motion reference materials that have been designated as confidential pursuant to the operative Protective Order in this case (Dkt. No. 148) and are currently subject to the parties' October 24, 2024 Joint Letter-Motion to Seal Plaintiffs' Motion to Compel and Related Exhibits (Dkt. No. 233).

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
Honorable Ona T. Wang  
United States Magistrate Judge